

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Civil Case No. 20-cv-13275

Honorable Judith E. Levy

vs.

\$18,313.00 U.S. Currency;
\$470.00 U.S. Currency; \$1,278.00
U.S. Currency; and (1) Ladies 18K
white gold Oyster Perpetual Rolex
6917 Watch;

Defendants *in rem*.

Stipulated Consent Judgment and Final Order of Forfeiture

The parties, by and through undersigned counsel, **STIPULATE**
and **AGREE** as follows:

1. On December 11, 2020, the United States of America filed a
verified complaint for forfeiture, ECF No. 1, pursuant to 21 U.S.C. §
881(a)(6), against the following defendants *in rem*:

- a) \$18,313.00 U.S. Currency;
- b) \$470.00 U.S. Currency;
- c) \$1,278.00 U.S. Currency;
- d) One (1) Ladies 18K white gold Oyster Perpetual Rolex 6917

Watch;
(Defendant Assets).

2. The government completed service of the complaint on April 21, 2020, ECF No. 11, and completed online publication of Notice of Forfeiture Action on an official government internet site, (www.forfeiture.gov) on July 20, 2021.

3. On May 5, 2021, Anneisha Williams filed a verified claim of interest in the Defendant Assets, ECF No. 13. She filed her answer to the complaint on April 23, 2021, ECF No. 10.

4. No other verified claims have been filed in this judicial action with regard to the Defendant Assets, and the time for filing such pleadings has expired.

5. Plaintiff, the United States of America, and Claimant Anneisha Williams, by and through her attorney, Wright W. Blake, wish to resolve this matter without further litigation and expense.

Now therefore, the parties stipulate as follows:

6. This action is a civil *in rem* forfeiture action brought pursuant to 21 U.S.C. § 881(a)(6).

7. This Court has jurisdiction and venue over this action

pursuant to 28 U.S.C. §§ 1345, 1355, 1391, and 1395.

8. The allegations of the Complaint for Forfeiture are well taken, the United States and its agents had reasonable cause for seeking forfeiture of the above-enumerated property as provided in 21 U.S.C. § 881(a)(6), the Government's position in this action is substantially justified as provided in 28 U.S.C. § 2412(d)(1)(B), and Claimant shall not claim or seek attorney fees from the United States under the Civil Asset Forfeiture Reform Act, the Equal Access to Justice Act, or any other act, statute or regulation.

9. Acceptance of this settlement by Claimant does not constitute an admission of liability or an acknowledgement of any wrongdoing whatsoever on the part of the Claimant.

10. The amount of \$15,813.00 of the \$18,313.00 Defendant *in rem* U.S. Currency and all interest accrued on the full amount of the \$18,313 Defendant *in rem* U.S. Currency ("Forfeited Currency"), **SHALL BE FORFEITED** to the United States of America pursuant to 21 U.S.C. § 881(a)(6). Further, any right, title or interest of Claimant and her successors and assigns in the Forfeited Currency is hereby and forever **EXTINGUISHED**, and clear title to said assets shall hereby be

VESTED in the United States, and the United States Marshals Service is **AUTHORIZED** to dispose of the Forfeited Currency according to law.

11. The remainder of the Defendant Assets:

- a) \$2,500 of the \$18,313.00 Defendant *in rem* U.S Currency;
- b) \$470.00 U.S. Currency;
- c) \$1,278.00 U.S. Currency; and
- d) One (1) Ladies 18K white gold Oyster Perpetual Rolex 6917 Watch;

shall **NOT** be forfeited but shall be **RETURNED** to Claimant following the entry of this Stipulated Consent Judgment. The ladies Rolex watch shall be **RETURNED** to Claimant or her attorney by mutual arrangement with the United States Marshals Service. The currency to be returned shall be returned less any debt owed to the United States, any agency of the United States, or any other debt that the United States is authorized to collect from the Claimant, including but not limited to any debts collected through the Treasury Offset Program.

12. Following entry of this Stipulated Consent Judgment, and receipt by the U.S. Attorney's Office of the Claimant's social security number and Automated Clearing House information from attorney for

the Claimant, the United States Marshals Service for the Eastern District of Michigan or its delegate shall disburse the funds through the Electronic Payment System by means of electronic deposit to attorney Wright W. Blake's IOLTA account.

13. Upon entry of this judgment, Claimant Anneisha Williams forever waives any appellate rights she may have pertaining to this civil forfeiture action.

14. Claimant hereby knowingly and voluntarily waives any and all right to reimbursement by the United States of reasonable attorney fees and litigation costs in connection with this civil forfeiture action under 28 U.S.C. § 2465(b)(1)(A), or any other statute that might conceivably apply.

15. Claimant agrees to release, remise, and discharge plaintiff, the United States of America, and any of its agencies involved in this matter, including the Drug Enforcement Administration, the United States Attorney's Office, and their agents, officers and employees, past and present, from all claims or causes of action which Claimant and her agents, officers, employees, assignees and/or successors in interest have, may have had or may have on account of the events or circumstances

giving rise to the above-captioned action.

16. Both parties to this Stipulated Consent Judgment have discussed this settlement with counsel, and fully understand its terms and conditions and the consequences of entering into it. The parties agree that each shall bear their own costs in this matter.

DAWN N. ISON
United States Attorney

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Dated: January 3, 2022

s/ WRIGHT W. BLAKE
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(P37259)

Dated: 1/7/22

(Signature page attached)
Anneisha Williams
Claimant

Dated: 1/7/22

IT IS SO ORDERED.

s/Judith E. Levy
Honorable Judith E. Levy
United States District Judge

Date: February 22, 2022


giving rise to the above-captioned action.

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Dated: 1/7/22


Anneisha Williams
Claimant

Dated: 1-7-22